

# Exhibit P

## (previously filed as Dtk. 660-16)

Page 1

1 UNITED STATES DISTRICT COURT

2 FOR THE

3 EASTERN DISTRICT OF VIRGINIA

4 -----X  
5 United States et al.,

6 Plaintiff,

7 v.

8 GOOGLE LLC,

9 Defendant.

10 -----X  
11 Civil Action No. 1:23-CV-00108

12 HIGHLY CONFIDENTIAL

13 VIDEOTAPED DEPOSITION

14 OF

15 JOHN DEDERICK

16 FRIDAY, JULY 28, 2023

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18  
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20  
21  
22  
23  
24 Reported by:

CANDIDA BORRIELLO

JOB NO. 6418591-001-001

John Dederick - Highly Confidential

32925

28, 2023

182 to 185

<p style="text-align: right;">Page 182</p> <p>1 J. Dederick - Highly Confidential</p> <p>2 Q. And what impact, if any, does that</p> <p>3 have on advertisers?</p> <p>4 A. So, if an advertiser is coming to a</p> <p>5 buy-side platform, they're asking that</p> <p>6 buy-side platform to evaluate ads on their</p> <p>7 behalf and buy the most cost effective and</p> <p>8 the most performance. The thing that will</p> <p>9 get me the most growth, the most sales for</p> <p>10 the lowest cost. If instead of buying the ad</p> <p>11 that's the lowest cost and the most</p> <p>12 performant, I buy the one that makes me the</p> <p>13 most money. It is very likely not the least</p> <p>14 expensive or the most performant.</p> <p>15 And so, the cost for advertisers of</p> <p>16 self-preferencing or biassing demand is gonna</p> <p>17 be increased cost of their advertising and a</p> <p>18 loss in potential growth or performance that</p> <p>19 they're getting from marketing or</p> <p>20 advertising.</p> <p>21 Q. Are you aware of or heard anything</p> <p>22 of what's called Project Poirot?</p> <p>23 A. I have -- I have heard about</p> <p>24 Project Poirot.</p> <p>25 Q. And what have you heard?</p>	<p style="text-align: right;">Page 184</p> <p>1 J. Dederick - Highly Confidential</p> <p>2 So, again, if you don't work inside</p> <p>3 the walls of Google, you don't really</p> <p>4 understand why the self-preferencing is</p> <p>5 happening, but the outcome is incredibly</p> <p>6 clear. And so, is that exactly why? People</p> <p>7 outside the walls of Google would be hard to</p> <p>8 tell, but it is very clear what's happening.</p> <p>9 I mean, self-preferencing is happening.</p> <p>10 Q. So, it's -- what impact on</p> <p>11 advertisers would self-preferencing have good</p> <p>12 or done?</p> <p>13 MS. RHEE: Objection to form.</p> <p>14 MR. CHIU: Same objection.</p> <p>15 A. So, self-preferencing by the</p> <p>16 buy-side platform, so many -- many of the</p> <p>17 practices that are being questioned are with</p> <p>18 regard to whether auctions or bids are being</p> <p>19 manipulated in order to direct more spend to</p> <p>20 Google properties or Google ad exchange or</p> <p>21 Google ad server, and in every one of those</p> <p>22 instances, if the auction is being</p> <p>23 manipulated on a basis other than in the</p> <p>24 interest of the publishers that the ad server</p> <p>25 is serving or the advertisers, the</p>
<p style="text-align: right;">Page 183</p> <p>1 J. Dederick - Highly Confidential</p> <p>2 A. Project Poirot is something that,</p> <p>3 you know, came to my attention via the</p> <p>4 Complaint. And so, what I understand is what</p> <p>5 I've read in the complaint and I can comment</p> <p>6 on how that would work and what that would</p> <p>7 do. What I can say from, you know, what</p> <p>8 is -- so -- and again, if -- if that -- if</p> <p>9 what's described in the complaint --</p> <p>10 MS. RHEE: Objection, if that's</p> <p>11 the basis of the answer.</p> <p>12 MR. CHIU: Let him finish.</p> <p>13 A. Yeah, I'm just gonna finish the</p> <p>14 thought. I can describe what the impact, you</p> <p>15 know, and what my clients have reported that</p> <p>16 is likely a result of that.</p> <p>17 MS. RHEE: Objection. Calls for</p> <p>18 speculation.</p> <p>19 A. So, if in fact Google chose to</p> <p>20 increase bids or bid frequency on their</p> <p>21 own -- on their own ad exchange, which is</p> <p>22 what's described in Project Poirot, that</p> <p>23 would create the biassing and the</p> <p>24 self-preferencing that we talked about a</p> <p>25 moment ago.</p>	<p style="text-align: right;">Page 185</p> <p>1 J. Dederick - Highly Confidential</p> <p>2 demand-side is serving, then all of those</p> <p>3 participants are losing out and the gainer is</p> <p>4 Google. And the reason is that</p> <p>5 self-referencing will again drive biassing</p> <p>6 toward Google properties, it will drive</p> <p>7 biassing toward higher margin products for</p> <p>8 Google. It won't drive to the most cost</p> <p>9 effective ad for an advertiser or to the</p> <p>10 lowest cost potential ad for an advertiser.</p> <p>11 Q. So, I think we have been going</p> <p>12 about 50 minutes. Do you want to keep going</p> <p>13 or do you want to take a break?</p> <p>14 MS. PREWITT: Why don't we take a</p> <p>15 break?</p> <p>16 THE WITNESS: Cool, sounds good.</p> <p>17 MR. VERNON: Go Off the record.</p> <p>18 THE VIDEOGRAPHER: We are off the</p> <p>19 record. The time is 3:31 p.m.</p> <p>20 (Whereupon, a brief recess was</p> <p>21 taken.)</p> <p>22 THE VIDEOGRAPHER: We are back on</p> <p>23 the record the time is 3:44 p.m.</p> <p>24 BY MR. VERNON:</p> <p>25 Q. Welcome back.</p>

John Dederick - Highly Confidential

32926 28, 2023

186 to 189

<p style="text-align: right;">Page 186</p> <p>1 J. Dederick - Highly Confidential</p> <p>2 So, earlier I think you said The</p> <p>3 Trade Desk tries to avoid unnecessary</p> <p>4 sell-side fees.</p> <p>5 If I got that right, why does The</p> <p>6 Trade Desk do that?</p> <p>7 MS. RHEE: Objection to form.</p> <p>8 Misleading.</p> <p>9 MR. CHIU: Same objection.</p> <p>10 A. So, The Trade Desk is a buy-side</p> <p>11 platform, right, we only operate on behalf of</p> <p>12 advertisers and so what we're trying to do is</p> <p>13 buy the most performant lowest cost. To the</p> <p>14 extent the sell-side introduces fees, are</p> <p>15 they worth it or not? That's the question</p> <p>16 for us, and for our advertisers. So, if I --</p> <p>17 in saying we're trying to avoid unnecessary</p> <p>18 sell-side fees, that is us attempting to</p> <p>19 optimize to the most efficient, effective</p> <p>20 supply path or, like, way to buy an ad for an</p> <p>21 advertiser. And unfortunately, on the</p> <p>22 sell-side, there have been a tremendous</p> <p>23 amount of non-transparent fees or</p> <p>24 gamesmanship in order to introduce</p> <p>25 unnecessary fees in our view. And so, we</p>	<p style="text-align: right;">Page 188</p> <p>1 J. Dederick - Highly Confidential</p> <p>2 advertisers?</p> <p>3 MR. CHIU: Objection to form.</p> <p>4 MS. RHEE: Objection to form.</p> <p>5 A. Well, any fees that are introduced</p> <p>6 to a transaction obviously increase or can</p> <p>7 increase the price of the ad for an</p> <p>8 advertiser. Now, I'm a proponent of adding</p> <p>9 value and introducing more value for</p> <p>10 participants, whether that's value on behalf</p> <p>11 of the publisher, value on behalf of the</p> <p>12 advertiser, both of those things can derive</p> <p>13 these.</p> <p>14 So, to me, all fees aren't bad</p> <p>15 fees, but those fees that are actually not</p> <p>16 serving the interest of publishers or</p> <p>17 advertisers, but really just serving the</p> <p>18 interest of whoever is charging the fee,</p> <p>19 those are the bad ones, as in those are the</p> <p>20 ones that we want to help advertisers avoid</p> <p>21 and a genuine effort from an SSP or an ad</p> <p>22 exchange would also be trying to help</p> <p>23 publishers avoid. So, we don't have an issue</p> <p>24 with genuine or valuable fees being taken, it</p> <p>25 is the fees that we view as, you know, only</p>
<p style="text-align: right;">Page 187</p> <p>1 J. Dederick - Highly Confidential</p> <p>2 spend an awful lot of time trying to bid and</p> <p>3 find ads that will be the most valuable for</p> <p>4 an advertiser to buy.</p> <p>5 Q. In the context of a Display ad</p> <p>6 exchange, what is a take rate?</p> <p>7 MS. RHEE: Objection to form.</p> <p>8 A. For a Display ad exchange, they'll</p> <p>9 typically -- their revenue model will be a</p> <p>10 combination of a revenue share or percentage</p> <p>11 of the ads that are bought through their</p> <p>12 exchange and that's how they make money. And</p> <p>13 there are a number of ways that that can be</p> <p>14 increased or made variable. And so, when we</p> <p>15 think about what are the take rates or what</p> <p>16 are the fees that an SSP or an exchange are</p> <p>17 going to take of a transaction.</p> <p>18 Unfortunately, it's not very transparent to</p> <p>19 buyers about what those fees are.</p> <p>20 And so, when we say take rate from</p> <p>21 a Display ad exchange or an SSP, we're</p> <p>22 talking about the fees that that SSP or</p> <p>23 exchange is taking from the transaction.</p> <p>24 Q. What impact, if any, would a higher</p> <p>25 Display ad exchange take rate have on</p>	<p style="text-align: right;">Page 189</p> <p>1 J. Dederick - Highly Confidential</p> <p>2 acting on behalf of another party and not</p> <p>3 adding value to the transaction that we think</p> <p>4 are a problem.</p> <p>5 Q. And from your experience, what</p> <p>6 exchanges have those sell-side fees that you</p> <p>7 view as problematic?</p> <p>8 MS. RHEE: Objection to form.</p> <p>9 A. So, certainly the most</p> <p>10 non-transparent exchange is AdX. AdX, you</p> <p>11 know, between how DFP the publisher ad server</p> <p>12 with 90 percent share of publishers to AdX</p> <p>13 with majority share of the ad exchange</p> <p>14 market, how those two interact with one</p> <p>15 another is not transparent. The dynamics,</p> <p>16 outcomes, what's happening in the auction</p> <p>17 that AdX is running is not transparent. And</p> <p>18 what we know, in retrospect, is that things</p> <p>19 like open bidding were happening and open</p> <p>20 bidding introduced a 5 percent fee to the</p> <p>21 transaction. And in the view of many of the</p> <p>22 advertisers that I talked to and agencies</p> <p>23 that I talked to didn't add any value for the</p> <p>24 advertisers or for the publishers, it was</p> <p>25 just 5 percent for Google and that is a</p>

Page 190

1 J. Dederick - Highly Confidential

2 pattern of practices, that is, what we think  
3 of as sort of a blank check. If you have the  
4 front door to the internet and you have the  
5 advertiser ad server and the advertiser  
6 buying platform and the ad exchange and SSP  
7 and the publisher ad server, you have a blank  
8 check to take fees and no one is checking it.  
9 And so, we have heard in every time there is  
10 transparency or an effort towards  
11 transparency into what's happening in the  
12 auction, that is where we here Project Bell,  
13 Project Bernake, Project Poirot, blah, blah,  
14 blah, blah, it's -- it's endless. And that  
15 is a result of one party controlling all  
16 aspects of the auction and a total lack of  
17 transparency from buyers and for others into  
18 what's happening.

19 Q. What impact, if any, on advertisers  
20 is there from AdX's non-transparent fees?

21 MS. RHEE: Objection to form.

22 MR. CHIU: Objection. Lacks  
23 foundation.

24 A. As AdX and DFP collectively control  
25 the auction where bids are submitted and won

Page 191

J. Dederick - Highly Confidential

into ad selection by the publisher, as in what ad is actually shown at what cost, to the extent that self-preferencing and biassing of demand creates unnecessarily high fees or ads that could've been more performant elsewhere, advertisers are losing money, they're losing -- they're losing out on what they think of as working media spend or how much spend is actually going toward the media that they wanted to buy and they're losing out on performance. And so, the goals that they set out for their marketing effort are gonna suffer.

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Page 192

Term	Percentage
Climate change	98%
Global warming	95%
Green energy	88%
Sustainable development	85%
Environmental protection	82%
Ecology	78%

10 Q. How successful has The Trade Desk  
11 been in competing with Google's DV360 for  
12 Display?  
13 A. The Trade Desk has not been  
14 successful at competing with Google's DV360  
15 for Display advertising.

16 Q. And why is that?

17           A. I think the reason The Trade Desk  
18 has effectively not been able to compete with  
19 DV360 for Display advertising really comes  
20 back to Google's dominant position in  
21 publisher ad serving, in the Display ad  
22 network in AdWords and in the ad exchanges  
23 with AdX. The advantage that that level of  
24 supply concentration that level of data  
25 creates is one big reason that we've

<p style="text-align: right;">Page 194</p> <p>1        J. Dederick - Highly Confidential 2 struggled. And the other big reason, and 3 this is more than just Display, this is 4 also -- this is a challenge across the board 5 competing with Google properties is the 6 incredible data asset that Google has. 7 Google has billions of logged in users with 8 associated metadata that is very valuable for 9 advertisers. And that's exclusively 10 available via Google's tools. And, you know, 11 the typical rationale is because of privacy, 12 they can't possibly make it available outside 13 of Google's own buying tools.</p> <p>14        And so, really it's about the 15 dominant position in the supply marketplace, 16 the huge advantage that that means for 17 inventory supply and data about the supply 18 and then the enormous advantage in audience 19 data, consumer data, how should we target 20 these audiences and what would be performant. 21 Those are the two pieces that make it 22 basically impossible for us or anyone else to 23 compete with Google's Display marketplace.</p> <p>24        Q. And when you were talking about 25 competing with Google in Display, why did you</p>	<p style="text-align: right;">Page 196</p> <p>1        J. Dederick - Highly Confidential 2        Q. All right. So, you mentioned 3 "first look." When you refer to "first 4 look," again in the context of Display, what 5 are you referring to?</p> <p>6            MS. RHEE: Objection.</p> <p>7        A. I would love -- would you mind 8 focusing on what aspect of "first look" or 9 where, are we talking about ad exchanges? 10 Would you just rephrase your question?</p> <p>11        Q. Sure, I'm trying to think. 12            What do you understand first look 13 in the context of Display to be?</p> <p>14        A. So, first look in the context of 15 Display advertising is a concept of one party 16 getting early access to an auction. So, the 17 example I would give to make first look 18 possible is like what if every day the stock 19 market opened it opened an hour earlier for 20 one participant and they got to come in and 21 cherry-pick whatever they wanted before the 22 market opened for everybody else. That's 23 what first look is in the context of Display advertising. Because Google has the ad server, the publisher ad server, they could</p>
<p style="text-align: right;">Page 195</p> <p>1        J. Dederick - Highly Confidential 2 mention the publisher ad server?</p> <p>3            MS. RHEE: Objection to form.</p> <p>4        A. The reason the publisher ad server 5 is so important for Display performance is 6 because the publisher ad server is where ad 7 selection happens. So, who gets the ad at 8 what cost?</p> <p>9        If Google is able to determine that 10 their platform gets an ad instead of another 11 platform, or their platform just gets the ad 12 for a lower cost than another platform and 13 any associated advantage as in a first look, 14 as in a last look, as in, you know, a lower 15 bid still wins.</p> <p>16        Those are the reasons that it would 17 be basically impossible to win on a 18 performance basis and again, let's compare 19 this conversation to Connected Television 20 where Google's ad server is not dominant. 21 It's really not a coincidence that The Trade 22 Desk has been able to compete in a landscape 23 where Google's ad server doesn't have 24 90 percent market share and we can't where 25 they do.</p>	<p style="text-align: right;">Page 197</p> <p>1        J. Dederick - Highly Confidential 2 determine if Google bidders or Google's 3 exchange gets the first chance to bid or buy 4 an ad before anybody else does. And so, the 5 hope is for a fair and sort of even auction 6 and unfortunately one party gets to show up 7 an hour early.</p> <p>8        Q. Is Google's first look good for 9 advertisers or bad or how would you 10 characterize it?</p> <p>11        A. So, the fact that Google is able to 12 take first look using their publisher ad 13 server in conjunction with AdX is how, you 14 know, Google can either sell ads for two high 15 a cost or preference ads that won't be the 16 most performant for an advertiser.</p> <p>17        So, again, if you're an advertiser, 18 you want the most performant and the lowest 19 cost you can get. If Google is mostly 20 interested in pushing spend to their owned 21 and operated properties or monetizing 22 transactions through their pipes, through the 23 ad exchange and through the publisher ad server, that's gonna drive up unnecessary 24 costs for an advertiser and that's gonna mean</p>

<p style="text-align: right;">Page 198</p> <p>1        J. Dederick - Highly Confidential      2    they didn't buy an alternative ad that      3    could've been more performant.      4        Q. How does first look in the context      5    of Display affect The Trade Desk's ability to      6    compete, if at all?      7        A. So, when I've said that The Trade      8    Desk is effectively not been able to compete      9    with DV360 and AdWords for Display budgets      10   and for performance Display budgets, it's      11   things like first look where how could we      12   possibly compete on a performance basis if      13   another party got to look at the auction      14   first and preference their own bid or decide      15   not to even let us bid and participate, how      16   could we possibly participate on a cost or      17   performance basis if we don't have visibility      18   or control over any of that.      19        Q. Now, let me ask you about last      20   look.      21           In the context of Display, what do      22   you understand last look to be?      23        A. So, last look is similar to first      24   look in that this is -- this is the      25   communication between an ad exchange and a</p>	<p style="text-align: right;">Page 200</p> <p>1        J. Dederick - Highly Confidential      2        A. Last look as a capability is      3    really, you know, another -- another      4    opportunity for Google self-preferencing of      5    their supply and every time Google has the      6    opportunity to really push their supply,      7    their owned and operated or their high margin      8    properties, you know, that really takes them      9    out of the interest of whoever they're      10   claiming to serve, whether it's an advertiser      11   or a publisher. So, again, last look in      12   Display will raise costs for advertisers      13   unnecessarily and it will sacrifice potential      14   performance for advertisers.      15        Q. What impact, if any, does Google's      16   last look have on The Trade Desk's ability to      17   compete with DV360?      18        A. So, with a vertically integrated      19   stack with DV360, AdX and DFP, our clients      20   have said there's major efficiencies and      21   major claims of efficiencies about      22   preferential access to supply for -- for      23   DV360. And so, what it could mean and, you      24   know, what that preferencing would create is,      25   you know, buyers who are operating DV360 have</p>
<p style="text-align: right;">Page 199</p> <p>1        J. Dederick - Highly Confidential      2    publisher ad server, this is the ad exchange      3    getting the opportunity to, you know, have      4    access to the publisher ad server in a way      5    that others can't, other ad exchanges can't.      6        So, if I were to try to give an      7    example of what last look would be, I guess      8    it would be like a -- it would be like a      9    silent auction where, let's say, we all --      10   everybody in this room put in an anonymous      11   bid and then -- and then I was also a bidder,      12   but before I put my bid in, I got to open all      13   of your bids first and then decide what I      14   wanted to bid. That's what last look      15   effectively does. It is all of the other      16   bidders' information is already on the table,      17   none of them knew what the others were      18   bidding, and that's DSPs, that's ad      19   exchanges. And then one party gets to open      20   all the bids and decide what they want to do      21   with it. That's what last look does to the      22   context of Display advertising.      23        Q. And is last look good for      24   advertisers or bad or how would you      25   characterize it?</p>	<p style="text-align: right;">Page 201</p> <p>1        J. Dederick - Highly Confidential      2    better more frequent, more efficient ad      3    opportunities within Google's publisher ad      4    server than buyers on The Trade Desk would.      5        Q. How, if at all, does that impact      6    The Trade Desk's ability to compete with      7    Google?      8        A. So, The Trade Desk won't be able to      9    buy the same ads. The Trade Desk would      10   potentially have to pay more for the same ads      11   than DV360. And again, performance is about      12   buying ads at the lowest cost as judged by      13   the ad servers and, you know, Google has      14   publisher ad servers and advertiser ad      15   servers to help determine that.</p> <p>16        [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>

	Page 202	
1	[REDACTED]	J. Dederick - Highly Confidential
2	[REDACTED]	the same company. So, if those are the key
3	[REDACTED]	participants in an auction and no one outside
4	[REDACTED]	of Google has transparency into what's
5	[REDACTED]	happening, I don't know how you could imagine
6	[REDACTED]	that that would be a fair auction.
7	[REDACTED]	Q. Other than what we've already
8	[REDACTED]	talked about, what other examples are you
9	[REDACTED]	aware of of Google doing things that you view
10	[REDACTED]	as not being a fair auction?
11	[REDACTED]	A. I would say any forms of bid
12	[REDACTED]	manipulation where, again, we just don't have
13	[REDACTED]	transparency into. If you don't work at
14	[REDACTED]	Google, you don't know whether -- how this is
15	[REDACTED]	happening, when it's happening, if it's
16	[REDACTED]	happening, but it's widely reported on and
17	[REDACTED]	the speculation among publishers, advertisers
18	[REDACTED]	and agencies that manipulating bids for -- or
19	[REDACTED]	win rates is happening constantly. And not
20	[REDACTED]	surprisingly manipulating bids is at the
21	[REDACTED]	heart of every -- every, you know, potential
22	[REDACTED]	uncovered practice, whether that's Project
23	[REDACTED]	Poirot, Project Bernake, Project Bell,
24	[REDACTED]	dynamical allocation, dynamic revenue
25	[REDACTED]	sharing, unified auction. What all of those
	Page 203	
1	[REDACTED]	J. Dederick - Highly Confidential
2	[REDACTED]	things have in common is they are exerting a
3	[REDACTED]	level of unilateral control over the auction.
4	[REDACTED]	Many of those things represent falsely
5	[REDACTED]	altering advertiser bids without the
6	[REDACTED]	advertiser's awareness as in increasing or
7	[REDACTED]	decreasing advertiser bids without the
8	[REDACTED]	advertiser ever knowing that that's
9	[REDACTED]	happening. Many of those things represent
10	[REDACTED]	fixing or changing aspects of the auction to
11	[REDACTED]	give Google bidding preferential treatment.
12	[REDACTED]	So -- what all of those things have
13	[REDACTED]	in common is, you know, their attempts at an
14	[REDACTED]	unfair auction and they're successful.
15	[REDACTED]	Q. What is your understanding -- what
16	[REDACTED]	gives Google the ability to set the rules of
17	[REDACTED]	an auction for Display?
18	[REDACTED]	MS. RHEE: Objection. Lacks
19	[REDACTED]	foundation.
20	[REDACTED]	MR. CHIU: Same objection.
21	[REDACTED]	A. The reason that Google is able to
22	[REDACTED]	set the rules for all of the auctions is
23	[REDACTED]	complete dominance in the publisher ad server
24	[REDACTED]	marketplace, which again, that came from
25	[REDACTED]	dominance in Search, where Google's

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**ERRATA SHEET FOR THE TRANSCRIPT OF THE TRADE DESK**

Case Name: In Re: Google Antitrust Investigation

Dep. Date: July 28, 2023

Deponent: Jed Dederick/The Trade Desk

Page	Line	Correction	Reason for Correction
235	17	Change “exchange is” to “exchanges.”	Transcription error.
235	20	Change “in” to “and.”	Transcription error.
268	25	Change “knowledgeable how” to “knowledgeable about how.”	Transcription error.
274	18	Change “imagine” to “image.”	Transcription error.
282	13	Change “were the” to “would’ve been”	Transcription error.
288	15	Change “ask” to “pass.”	Transcription error.
290	21	Change “the rule” to “Google.”	Transcription error.

/s/ Matthew E. Gold  
Counsel for the United States

*United States v. Google LLC*

Google's Errata Sheet for Google's Counsel's Questions in the Transcript of the 30(b)(6) Deposition of The Trade Desk (John Dederick) (July 28, 2023)

Page	Line	Now Reads	Should Read	Reason
78	13	It then goes on hopefully to say	It then goes on helpfully to say	Transcription error
106	2	bid trading features	bid shading features	Transcription error
125	10	first price options	first price auctions	Transcription error
127	22	co-op predictive clearing	KOA predictive clearing	Transcription error
127	24	offerings	auctions	Transcription error
128	12	And when The Trade Desk built co-op	And when The Trade Desk built KOA	Transcription error
128	29	Desk intend to be	Desk intend it to be	Transcription error
129	6	When The Trade Desk built co-op	When The Trade Desk built KOA	Transcription error
131	10	multi queries	multiple queries	Transcription error
133	8	those efforts were not to cure header	those efforts were not to kill header	Transcription error
139	6	expressed consent	express consent	Transcription error
139	25	direct and expressed	direct and express	Transcription error
142	9	example enforcement	example of enforcement	Transcription error

I have read the transcript of the 30(b)(6) deposition of The Trade Desk and have listed all changes and corrections to my questions above, along with my reasons therefore.

Date: 9/5/2023

Signature: 

## ERRATA SHEET FOR JED DEDERICK DEPOSITION TRANSCRIPT

**Case:** United States vs. Google, 1:23-CV-00108 (E.D. Va.)

**Witness:** Jed Dederick

**Deposition Date:** July 28, 2023

**Reporter:** Candida Borriello

Page	Line(s)	Transcript Text	Corrected Text	Reason for Change
8	5	Chief client officer	Chief Client Officer	Transcription Error
9	21	skim	skip	Transcription Error
10	7	Adam Chiu	Aaron Chiu	Transcription Error
25	20	it's a claim	it's a false claim	Clarification
31	12-13	that it's happened is, it is not	that it's happened, it is not	Transcription Error
50	25	as a supporter conduit	as a conduit	Clarification
51	5-6	The Trade Desk does view ourselves as a gateway	The Trade Desk does view itself as a gateway	Transcription Error
51	10-11	gardens and participate in a transparent and competitive marketplace and are willing to compete	gardens. The open internet is a transparent and competitive marketplace with companies that are willing to compete	Clarification
70	4	buying an add	buying an ad	Transcription Error
70	15	publisher at server	publisher ad server	Transcription Error
71	21	without usually without	usually without	Clarification
75	21	Thank you so match	Thank you so much	Transcription Error
90	11	DDP	DFP	Transcription Error
90	17	buy-side, only representative	buy-side only representative	Transcription Error
92	12	Tim Simms	Tim Sims	Transcription Error
98	5	The Trade Desk take rate	The Trade Desk's take rate	Transcription Error
98	9-10	And when we	And when he	Transcription Error
100	12	We a largely self-service	We are a largely self-service	Transcription Error
103	12	an advertiser know	an advertiser knows	Transcription Error
103	17-18	trade desk	Trade Desk	Transcription Error
106	2	bid trading features	bid shading features	Transcription Error
108	2	bid on supplies	bid on supply	Transcription Error
109	22-23	The Trade Desk operates just an enormous bunch of effort	The Trade Desk puts a lot of effort	Clarification
110	20	The Trade Desk does doesn't - - is	The Trade Desk is	Transcription Error
115	19	platform, they almost always going to	platform, they are almost always going to	Transcription Error
125	10	first price options	first price auctions	Transcription Error
126	25	was - - were	we were	Transcription Error

127	22	co-op predictive clearing	KOA predictive clearing	Transcription Error
127	25	Co-op predictive clearing	KOA predictive clearing	Transcription Error
128	12-13	built co-op predictive clearing	built KOA predictive clearing	Transcription Error
129	6-7	built co-op predictive clearing	built KOA predictive clearing	Transcription Error
132	25	can buy and ad	can buy an ad	Transcription Error
135	18	title wave across	tidal wave across	Transcription Error
137	20	an anonymized	a pseudonymous	Clarification
138	6-7	a party has to have consent	a party has to give consent where required	Clarification
138	23-24	one way to use consented for targeting	one way to use consent-compliant data for targeting	Transcription Error and Clarification
140	7	internet to collect consent	internet, who collect consent	Transcription Error
140	18	Well, there are a set of standards	Well, there are contracts and a set of standards	Clarification
142	5	unconsented way	non-compliant way	Clarification
143	7-8	the standards that we're asking them to	the standards that they agree to	Clarification
144	14	who can use ID2	who can use UID2	Transcription Error
151	17	Chief client officer	Chief Client Officer	Transcription Error
152	23-24	chief client officer	Chief Client Officer	Transcription Error
157	4	access to to drive	access to drive	Transcription Error
160	5	dominant exchange or in SSP	dominant exchange or an SSP	Transcription Error
167	20	describe that as a money as a monopoly	describe that as a monopoly	Transcription Error
172	13	what our clients spend and	what our clients spend on and	Transcription Error
178	24	that journalism is buying now	that journalism is dying now	Transcription Error
184	11-12	self-preferencing have good or done?	self-preferencing have, good or bad?	Transcription Error
185	5	self-referencing	self-preferencing	Transcription Error
190	12	where we here	where we hear	Transcription Error
192	10	Walled Garden	walled gardens	Transcription Error
221	14	buy via DV3670	buy via DV360	Transcription Error
224	13	our publically	our publicly	Transcription Error
226	22	at the publically	at the publicly	Transcription Error
228	7-8	chief client officer	Chief Client Officer	Transcription Error
264	13	UID	UID2	Transcription Error
264	23	gain consent and authenticate	gain consent where required and authenticate	Clarification
266	4	consented	consent-complaint	Clarification
269	9	the trade desk	The Trade Desk	Transcription Error
277	21	The Trade Desk was ranged	The Trade Desk was ranked	Transcription Error
278	22	You Tube	YouTube	Transcription Error
312	14	publically	publicly	Transcription Error

I, Jed Dederick, do hereby certify: that I have read deposition transcript dated July 28, 2023; that the changes and corrections to my transcript set forth above are necessary to render the same true and correct; that having made such changes, I hereby subscribe my name to the deposition. I declare, under penalty of perjury that the foregoing is true and correct.

Executed this 11th day of September, 2023 at New York, NY.  
(City/State)

DocuSigned by:



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Jed Dederick